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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO, CALIFORNIA

In re:

CHAPTER 7

CASE NO. 2010-36689

JEFFERY SUTHERLAND and MARY
SUTHERLAND,

D. C. NO.: CLH-1

DATE: August 24, 2010

TIME: 9:30 a.m.

DEPT: 35

Debtors.

**MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON THE DEBTORS'
BUSINESS AS ASSET OF THE ESTATE (11 USCS § 554(b), 721)**

Debtors JEFFERY AND MARY SUTHERLAND, by and through their attorney of record, will and hereby do bring a Motion to Compel Trustee to Abandon Debtors' Business As Asset of the Estate ("Motion") pursuant to 11 U.S.C.S. § 554(b) and § 721 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6007(b).

By this Motion, Debtors request that the Court enter an order compelling the Chapter 7 Trustee to abandon the bankruptcy estate's interest in Debtors' business on the following grounds:

1. Debtors' business does not possess or own any assets that might be liquidated for value to benefit creditors and is therefore of inconsequential benefit to the estate and;

2. The retention and operation of the business by the Trustee would be burdensome and costly to the estate and the creditors thereof.

1 Said grounds will be supported by this Motion, Declaration in support of this Motion, the
2 pleadings and papers on file in this bankruptcy case, and by such oral and documentary evidence
3 as the Court may permit upon the hearing of this Motion.

4 Dated: July 23, 2010

5 Law Offices of
6 CHARLES L. HASTINGS

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8 By /s/ Charles L. Hastings
9 CHARLES L. HASTINGS
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